

REMARKS

Claims 1-20 have been rejected over Armstrong in view of Bart et al. This rejection is respectfully traversed. To see 5 the difference in Applicant's system from both Armstrong and Bart et al, assume that a person is in a serious automobile accident on a lonely stretch of road. Help comes along, even a physician. The physician sees the memory card on the injured person but does not happen to have with him, a computer reading device, required 10 by Armstrong. How many people, or even emergency medical personnel have such a reading device normally with them. Thus, Armstrong's device is useless until the injured person is taken to a hospital where computers are available to read the memory card.

15 Bart et al utilizes a Read-Only Memory (ROM) chip (Col. 4, lines 68-60) in a bistable spring wrist band, strictly as a toy, Col. 1, line 7. A ROM chip cannot be re-recorded, since it is read-only. When dealing with critical medical information, it is very important to have the ability to up-date and re-record the 20 recorded medical information because a person's medical condition often changes, medications may change, and the information must be up-dated, so that accurate information is provided. Applicant provides that ability by having access to the chip in his system to re-record the changed information whenever necessary, see page 25 5, lines 5-8 of the specification. Claim 15 has been amended to

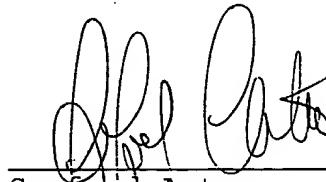
add the access to the chip in the bracelet for re-recording and up-dating the medical information contained on the chip. Bart et al's toy does not contemplate this important feature, and with Bart's device, the ROM chip has to be thrown away if a change of 5 information is needed for any reason, forcing the consumer to purchase a new toy band. Applicant, on the other hand, can provide a service to up-date the information on the memory chip at any time and as often as is necessary.

There is little basis to consider combining the teachings of 10 Armstrong, a computer memory card and Bart et al, a toy. However, even if that were considered, Applicant has greatly improved the teachings of both references by providing an updatable audio medical bracelet by which anyone, even an untrained person at the scene of an accident, can access an injured or ill 15 party's critical medical information.

Early allowance of the claims, as amended, is respectfully requested.

Respectfully submitted

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